To: Kamyar Guivetchi
Paul Dabbs

Cc: CCP team

From: Gregory Weber

Date: October 15, 2003

Re: Urban Caucus Comments:

Attached please find five sets of comments on Volume 1 from members of the Urban Caucus. These include:

1. CUWA written comments
2. Grace Chan written comments
3. Larry Rohlfes' written comments
4. Kirk Brewer's written comments
5. Comments made during caucus conference call 10.6.03

1. CUWA's written comments

DATE: October 1, 2003

TO: Greg Weber, Water Plan Update Facilitator

FROM: Elaine Archibald, CUWA Representative to Water Plan Advisory Committee

SUBJECT: Comments on Current Draft Chapter 5 Material

This is a follow-up to the urban caucus discussion prior to the September 19, 2003 Bulletin 160 Advisory Committee meeting. As you know, CUWA member agencies have provided a number of individual comments the past few months on pieces of the draft Bulletin. The comments below supplement separate comments that may be submitted by our member agencies on the current draft. Due to the need for DWR to get "fatal flaw" and other higher-level comments by October 2, our comments focus only on selected discussions in Chapter 5.

DWR has asked that comments from members of the Advisory Committee be delivered as much as possible through the separate caucuses. For a variety of reasons, the urban caucus has not proven to be an effective vehicle to get input from urban water agencies. Several people at the last urban caucus meeting suggested forming some sort of urban water agency caucus. CUWA will take the lead in getting a number of urban water agencies together to gather and submit comments, in addition to participating in the current urban caucus. We understand DWR's goal of getting the best input from the broadest range of interests.

Our comments below are organized by title of the separate Chapter 5 papers.

Conjunctive Management

The second paragraph has a good description of the elements of conjunctive use. The word "imported" on page 1, line 22 should be replaced with "previously stored" since the point made is not unique to imported water. The phrase "allowing natural recharge to increase groundwater storage" on page 1, lines 34 and 35 should be deleted.

The discussion of potential benefits starting on page 2 is a good one but further clarification is warranted. It is not clear how "conservative estimates" are reached – i.e. the judgment of which estimates from the cited studies can be described as conservative. Some form of implementation potential should accompany estimates of potential benefits: how can we be sure these will happen? As stated elsewhere in our comments, a "cheerleading" set of potential benefits needs also to include some measure of how such benefits might be accomplished. This adds further credibility to the Water Plan Update.

As to the benefits of conjunctive use, it is good to provide estimates. However, it would be very helpful to have a sense of how the estimated future water supply benefits might be provided. Every water system has a form of a water supply reliability curve, delivering more water in wet years than in dry years. Will the estimated increased delivery benefits occur across the entire spectrum of years, supplement dry years only, or a combination of these? Are the estimates based on the same assumptions, project-by-project, or do they represent mixed or unstated assumptions? We agree with the strong future potential in this area, but want to make sure that readers of the Water Plan Update have a better representation of potential benefits.

The sentence on page 4, lines 26 and 27, is excellent!

The discussion of the interconnections between surface and ground water is good (page 4), but ends with a general statement about stream impacts that would have more credibility if an example was cited.

It was disappointing that the water quality section (pages 4 and 5) did not include a discussion of the importance of cleaning up contamination problems in groundwater basins. It has been the policy of DWR and many local agencies for many years to encourage such efforts, since groundwater basins need to be viewed as long-term resources. We suggest DWR's groundwater staff add such a discussion.

The discussion "Lack of Integrated Management of Water Resources" is good since it reinforces the need for such integration. However, it leaves the reader with an impression that such integration is not happening, or is not getting started in some areas. Rather than leave the discussion as it currently reads, we'd suggest adding some examples (general or specific) about how and where this is happening. See our similar comment regarding the water transfers section below.

Conveyance

The conveyance paper is good – it captures both the big and small pictures, as well as the growing concern regarding maintenance of existing conveyance capacity -- both natural and constructed. Good job, balanced discussion. We have a few minor but important comments.

The phrase "over 600 miles" on page 1, line 22, should be deleted. This is a SWP number, but the sentence is written to include a wide range of large conveyance projects that together could add up to several thousand miles (CVP, Colorado River diversions, Hetch Hetchy, Mokelumne River Aqueduct, Los Angeles Aqueduct).

Suggest inserting "Sacramento Valley," before "San Francisco Bay area" on line 39, page 1.

The third paragraph on page 3 describes the CALFED Bay Area initiative. The South Bay Aqueduct is described as an "…existing, regional, multi-agency conveyance project." The Hetch Hetchy Aqueduct should also be added since it provides water supplies to many agencies in the region.

Desalination

This paper focuses primarily on seawater desalination and therefore our initial comments focus on this element. Consistent with the papers on water recycling and urban water use efficiency, the section on "Major Issues" should articulate how we can maximize this supply with the least overall impact to the environment. The section currently focuses on highlighting just the limitations. The following are some specific comments pertaining to the "Major Issues" section:

1. Remove the following sentence from the opening paragraph on page 3: "As a result, two additional issues have increased importance, environmental impacts and permitting (particularly for coastal plants)." These issues have not increased in importance – a project proponent has always had to deal with these issues.

2. In the paragraph on "cost and affordability", the importance of funding assistance for projects that benefit the state (reduced demand for imported water) should also be mentioned. (This was mentioned in both the Water Recycling and Urban Water Use Efficiency papers.)

3. In the paragraph on "seawater intakes", the following statements should be removed: "In general, these existing intake systems have been shown to have fairly significant impacts on the coastal zone. A number of coastal power plants that use once-through cooling from the ocean may cease operation or convert to a "dry" cooling system. In addition, some plants are not in continuous operation. These may limit the potential capacity of seawater desalting on the coast." There is no evidence provided in the paper to support these statements.

4. In the paragraph on "concentrate discharge", the last sentence should be removed. The sentence refers to limitations discussed in the previous paragraph, which are not substantiated in the paper.

5. In the paragraph on "growth-inducing impacts" it must be noted that it is the land use agencies that have control over where and how much growth should occur in the coastal zone. The cities and counties have the legal ability, through land use policies, to influence population growth patterns. The water agencies just respond to the growth identified by the land use agencies.

In addition to the above comments, we have the following comments on other sections of the paper:

6. The paragraph at the bottom of page 1 should be rewritten to reflect the fact that the Metropolitan Water District is developing a Seawater Desalination Program, which is a new funding program similar to the Local Resources Program, but specifically assists member agencies in developing seawater desalination projects.

7. The draft "*Seawater Desalination and the California Coastal Act*" Report being prepared by Coastal Commission staff is listed as a source used in preparation of this paper. We would suggest you not reference this source until it is finalized and approved by the Coastal Commission.

We would also appreciate receiving a copy of the project and cost tables that are referred to in the paper along with the Recommendations as soon as they are drafted.

Surface Storage – Regional/Local. Missing from this discussion is a description of the operational advantages and disadvantages of surface storage as compared to other types of storage (groundwater). This should be added.

The last sentence of the discussion "Allocation of Benefits and Costs" on page 5 should apply to all programs considered in the Water Plan Update. There is no reason to put this in one and not all (unless that is the plan). Perhaps this could be added (if not already there) to Chapter 1 and deleted here? Recommendation #1 on page 6 is similarly one that should apply to all Water Plan Update strategies.

System Reoperation

The EID example puts the issue in real terms. Other than this example and that of the CVPIA temperature control device, the discussion seems to imply that this is a new tool that should be used in the future -- with great potential. While the potential is very promising, system reoperation has been a matter of frequent discussion and actions for the SWP since about 1977 and 1978, when Jerry Meral (then a DWR deputy) asked Joyce Peters and others to develop a SWP "rule curve" to address something the environmental community was pushing at the time: if the SWP could take a little more risk (and get away from a "firm yield" kind of operation), the SWP could substantially increase annual average deliveries without building any new infrastructure. For more than 20 years the SWP has taken a bit more risk in order to secure this water supply gain. More details (if needed) are likely available from DWR/SWP operations staff.

As to opportunities for water supply gain with closer cooperation between the CVP and SWP, the discussion leaves an impression that this has been an untapped tool. The 1986 Coordinated Operations Agreement (17 years ago) was the first official step in that direction, and much of the COA resulted from annual agreements between DWR and the USBR that started to coordinate very closely following adoption of SWRCB Decision 1485 in August 1978. The story that could be told here is this is not a new tool, there have been past successes, and there continues to be opportunity to get more. Adding this will give the discussion more credibility. There are probably similar examples at the local level. The thrust of this discussion should be to develop this approach in a broader manner.

Urban Water Use Efficiency

We understand that the estimates of potential water savings planned to be included in this section are based on a recent study funded by DWR that applies existing conservation technologies. The cost-effectiveness of all measures is assessed from the customer's perspective. Estimates of savings potential assume that individuals and business would implement all measures deemed cost-effective by the study. Setting goals for water conservation in all sectors must be accompanied by recognition of the real-world challenges in attempting to reach such goals. We do not believe such implementation challenges are adequately addressed.

We are strong supporters of water use efficiency, and as water agencies we are often in leadership roles in implementing such programs. The California Water Plan update, in our view, needs to have a pragmatic implementation framework or strategy as well as a "cheerleading" component. An ongoing discussion of both factors is a much better approach than a "snapshot" every five years. This approach is consistent with regular comments from DWR management at Water Plan Advisory Committee meetings.

We are very supportive of the work this study represents; we see some limitations; and we are willing to engage in a longer-term process to provide both peer review and to engage in a more in-depth discussion of the practical aspects of setting and achieving goals for water conservation. We also recognize the importance of continued discussion of this topic, since the technical and policy underpinnings of such goals are likely to change over time.

Our specific comments regarding the text of the current draft are:

1. Recognition of real-world implementation challenges, measures and roles (particularly the roles of customers and water purveyors) should be added explicitly to the paper (perhaps under "Program Implementation" on page 3 or "Recommendations to Achieve Additional Urban Water Use Efficiency" beginning on page 5).

2. More work needs to be done with data collection and analysis upon which future water savings potential is based. Continued dialogue on appropriate data gaps and methods of collection is essential among the various water conservation professionals. We'd suggest you add something on "continued dialogue" to the "Data Collection" section on page 4.

3. Scientific peer review is an essential component of future water savings projections. It is essential in making sure we have the best available information and analysis, in addition to credibility. There is room for honest disagreement in this area due to a variety of uncertainties, but peer review and clear statements of assumptions and data will help. We recommend this be an explicit part of the paper, and do not find a section in the current paper on the development and peer review of future water savings projections. This may best fit into the "Recommendations to Achieve Additional Urban Water Use Efficiency" section beginning on page 5.

Water Transfers

Regarding the section, "Lack of Integrated Management of Water Resources", one could get the impression that no integration is happening now. Wouldn't a better approach be to say that greater opportunities exist than have been exploited to date, and there have been some recent gains in this area? Coming immediately to mind are the Sacramento Water Forum agreement, MWD's IRP that is regional in scope, the Sacramento Valley Water Management Agreement (Phase 8 agreement -- at least a start, with some initial practical benefits), Santa Ana River integrated management, etc. There are more examples of recent successes -- you could say this is a good start, with more opportunities. The ones cited provide opportunities to promote and encourage multi-purpose transfers -- which is the point made in the paragraph.

Finally, the EWA definition on page 4 seems too narrow -- perhaps in the interest of keeping this and other Chapter 5 papers as slim as possible. The definition of the EWA in the ROD (p. 54) is broader -- the Chapter 5 discussion could benefit from including the broader definition, particularly since it includes EWA uses beyond export cuts.

2. Grace Chan's Comments

Show-stoppers:

Summary & Overview

Dangerous sound bite – "With currently available, off-the shelf water conservation measures the water demand for the additional population would be between 2 to 3 million acre fee per year." Numbers have not been peer reviewed and have not controlled for overlaps. I can live with "Currently available, off-the-shelf water conservation measures can significantly offset the water demand increases caused by the additional population."

Urban Water Use Efficiency -- The tone of this section is too "pollyannaish"! Many statements are oversimplification and assertions without proper analytical support. Some examples:

- "The range of net water savings of proven urban water use efficiency efforts by 2030 has been estimated…" – take out the word "proven"; sentence internally inconsistent, if it is proven, why it is estimated.
- "The San Diego County Water Authority reports that their consumption for 2003 is up less than one percent since 1990 with a population growth of 16 percent. Similarly, the Bay Area…." While conservation plays an important role, other factors in demand

are just as important. If you just pick a different year, the conclusion would be completely different. This is a case of using number conveniently to mislead.

- "Water conservation has become a way of life… who have easy and affordable access to off-the-shelf…" **Affordable relative to what standard?** I take exception to that phrase when applied to high efficiency washing machines (2 to 5 times more expensive), landscape irrigation system (only beginning to show up in the market and is not cheap) water thrifty plants (only beginning to show up in the market, we get calls everyday from the public that they are hard to find.)
- "water use efficiency and conservation approaches have become a viable long-term supply option, {agree}, saving considerable {considerable by what standard?} capital and operating costs for utilities and consumers, {cannot draw that conclusion without analysis}.."
- "Water use efficiency can also reduce peak demand, {agree}, green waste production,…" {not sure if this is true}

Recycled Water, Potential Benefits, "this new water could substitute for enough fresh water to meet the household water demands of 30 to 50 percent of the household water demand." Two problems: 1) not sure how 1.2 million acre-feet equates to 30 to 50 percent, 2) gives the impression of "Toilet to Tap." Avoid inaccurate sound bites.

Area of major concerns or need work

Urban water use efficiency – comments submitted earlier on demand hardening
Area of consensus and disagreement – The document says, "to date only one are of significant disagreement remains…" Avoid making broad statements like this one. I believe there are more areas of disagreement, such as the role of water transfers, range of potential supply from water use efficiencies, etc. Suggest eliminating the last paragraph on p 16 of Overview section.

Conjunctive management – comments on wording, previously submitted.

Conveyance, Potential Costs, the ordering of sentences gives impression that Delta conveyance improvements are for SWP only. In fact, improvements benefit the environment, in-Delta users as well as SWP and CVP users.

Ecosystem Restoration, Costs of Ecosystem Restoration, in general carries a tone of blaming water managers and water projects for "damaging" ecosystems. Some example:

> Under **Water Supply Costs**, "An important way to reduce the need…is to incorporate ecosystem protection into water projects at the outset. This can reduce or eliminate the need for retrofits and mitigation." Seems contradictory to CEQA, and NEPA when applied, requires avoidance of adverse impact if possible and mitigation if not.
> Under **Major Issues, Single-purpose planning**, "Water managers incline toward single-purpose projects because…" Contradicts the statement in the **Floodplain Management** section, "Instead, governmental agencies and the private sector are

likely to garner the resources and public support for projects only if they achieve multiple benefits."

Regional/Local Surface Storage, p.2, second paragraph,
"A concept to be aware of is the net environmental effects….then the net affect on the environment could still be negative." Seems like an unsupported assertion. What value does this statement add?
Statements seems out-of-place:
p 2, second paragraph, "As both environmental and urban uses have grown…" This statement to the end of the paragraph pertains to State's surface water system.
P 4, second paragraph, "Finally, there may be large-scale federal projects…"

Chapter 6, chapter is too general. State needs to develop performance measures to monitor its progress. Also needs a system to track how recommendations of the various task forces are implemented. The State Water Plan should have a "report card" section.

Areas needing clean-up or clarification

Conveyance, Recommendation, #4 "Develop and promote analytical guidelines that uniformly consider supplemental conveyance…" What does this mean?

System Reoperation
P 1, first paragraph, "System reoperation is restructuring…to improve the beneficial uses of a fixed and limited water supply." Eliminate the "fixed and limited" as it is not necessarily true. One aspect of the Bay/Delta system reoperation for the Environmental Water Account involves real-time operation of the Export/Inflow ratio, which actually increased water supply. DWR should consider describing the operation of the Environmental Water Account, which is a recent, prime example of system reoperation.
P 7, Water Quality, " Reoperation using surface to actively recharge groundwater banks may be limited by existing groundwater or recharge water quality." Statement does not make sense.

Chapter 6
P5, #3, need to work on description of SB 672 and stay with what was passed. I do not believe that the term "self sufficient and reducing" was in the Bill. It says "minimizing the need."

P6, #4 continued, substitute "conjunctive management" with the generic term "storage".

P6, #8, "The State should give preference for assistance and funding to regional water initiative that include monitoring and data management… The State encourages pilot projects and focused research…" This seems to be contradictory to most RFPs criteria for state grants. Thus far, projects using proven methodology and yielding specific results are funded. This is understandable because the state executives and legislature want to ensure investments will yield return. May be a more practical suggestion is to have two tiered grants – one tier for projects using proven methodology and a second tier for pilot projects.

3. Larry Rohlfes' Comments

October 9, 2003

Paul Dabbs
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Dear Paul:

I have a serious concern about a recommendation in the Urban Water Use Efficiency section of Chapter Five in the latest draft of The California Water Plan Update. In the terminology that the Advisory Committee has been using in our recent discussions, this recommendation is a showstopper.

On page 174, the draft recommends the creation of "'California Friendly Landscapes,' landscapes that thrive with minimal or no supplemental irrigation."

This section could be read to mean that California should forbid the vast majority of plants that currently grace our urban landscapes and parks. Such a recommendation would be anathema to the green industry, the business community, and urban residents everywhere.

This recommendation appeared in the document only in the last week or two. In fact, it appeared so recently that I did not address it last Monday when I had an opportunity to submit comments to the Urban Caucus. Instead, I addressed some other relatively minor issues, as I was relying on a previous draft that I had downloaded only a few days earlier.

Hence, this letter to you.

In the previous drafts of the Urban Water Use Efficiency section, the recommendation was worded as follows: "Create a 'California Friendly Landscape.' Irrigate landscapes efficiently at xx percent of ETo or less through landscape design, installation, management and maintenance practices including plant selection, irrigation scheduling, landscape audits, dedicated irrigation meters, weather driven timers, etc.'"

I prefer this original wording, although my ultimate support for it is contingent on the number we use for the reference evapotranspiration percentage. This original wording makes it clear that there are many ways to conserve water when it comes to landscaping. It does not imply that the state of California should take an absurd zero or near-zero irrigation position when it comes to landscapes and parks.

I am perplexed as to how the current wording found its way into the current draft. I believe I attended every minute of every work group meeting on Urban Water Efficiency, but I have no recollection of any serious discussion about either a zero or near-zero irrigation policy for landscapes and parks, or the removal of the water efficiency target. I attended most of the Urban Caucus meetings, and I don't recall anyone making those proposals in that forum either. I did find it curious, however, that in neither forum did we have a discussion about what the ETo percentage should be.

In conclusion, I suggest that we do one of two things:

• Go back to the original wording if we want to set a realistic water efficiency target.

or

• Delete the first sentence of the current two-sentence recommendation.

> If we choose the first option, we should have a discussion about what the ETo percentage should be as soon as possible.

Thank you for considering these comments.

4. Kirk Brewer's Comments

It is still unclear to me if we are addressing the maximization of conservation or just that which is cost effective. This makes a tremendous difference in the potential yield.

We also need to be out-front with our strategy for dealing with grants and subsidies for those agencies where the cost of water is well under $50.00 an AF equating to almost all conservation being not cost effective. In other words we need to emphasize that an acre foot of conserved water is just that "conserved water". If, on an average, it cost $300.00 or whatever to conserve water then that equates to the regional or "Statewide" value and we need to make this message strong and clear.

My last point deals with the ole "demand hardening" syndrome, in simple terms this is way over emphasized. If it were all up to fixtures, then demand hardening is a real concern. But even homes equipped throughout with state-of-the-arts water conserving fixtures can still realize significant additional savings in times of drought or extreme need caused by some catastrophic event. Attitude and individual action can save at least as much more water as the installation of fixtures themselves. You only flush when there are solids not the average of the other 3 to 4 times per individual per day when there are only liquids. You really do take a "Navy shower" with the water being on for only a minute or two instead of the 10 min plus

shower. And outside, we turn off our sprinkler systems and water by hand, if necessary at all. If we really want to change outside water attitudes, we encourage utilities to provide soil probes to the happy homeowners or renters along with instructions that a 5th grader can understand this way they can determine when more outside water is really needed.

5. Comments made during October 6 conference call

[None of these were identified as "show stoppers", although several do raise substantial concerns that the draft might be heading down the wrong track]

Ch. 5, Urban Water Use efficiency, p. 4 reference to "if water rate changes reduce demand for ornamental landscaping, jobs could be lost."

Comment: this is true only if prices go up 5x or more; if prices only doubled, it might actually create more jobs because of demand for re-landscaping or more specialized landscaping

Re: Ch. 4 "Integrated management":

Comment: the implication is that integrated management is an "untapped" point; it has been done for a while successfully … make this more positive

Re: Ch. 5 in general:

Comment: there is unequal treatment of different water management alternatives; each "tool in the quiver" should be handled equally. E.g., there should be considerations of benefits and costs and advantages and disadvantages in all the strategies, not just in surface storage

Re: Volume 1 in general:

Comment: there's an obvious omission in the failure to discuss water quality in groundwater basins

Re: Volume 1 in general:

This is OK as it is, but will there be more water quality data in Volumes 3 and 4?

Comment:

I'm reserving judgment on the water quality piece. I'm not sure that the message holds together through the various parts. There is some discussion in the regional reports/basin plans. The rest, it's just mixed in. For us, it's the biggest issue. I'm not sure that "mapping water quality to source" is enough.

Comment: Chapter 5—water based recreation—water quality here is a big, ongoing issue

Re: Chapter 5, Urban Water Use Efficiency, p. 3, discussion of "transfers of wealth to water agencies"

Suggestion: add 'that issue can be addressed by providing rebates to people who purchase water use efficiency improvement devices."

Re: Chapter 2: reliability of irrigation water for food producers:

Comment: the implication of these materials is that California is completely feeding itself right now; in actuality, we import food from a wide variety of places

Re: Chapter 3, p. 19: climate change:

Question: what are the "no regrets" options that are mentioned?

Re: p. 23: reference to highways clogged with trucks:

Suggestion: change trucks to vehicles; it's not just trucks that are potential problems

Re: Ch. 5, p. 124, "urban land use management"

Comment: this is a great chapter. As for the recommendation about "encouraging less water intensive landscaping"—is this chapter about "lot size" or "landscaping"?